

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America )

v. )

JILLIAN SANTIAGO CRUZ )

a/k/a Julian SANTIAGO )

a/k/a Julian Santiago RODAS )

Case No. 25-mj-675

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 27, 2025 in the county of Montgomery in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section*

8 U.S.C. § 1326(a)

*Offense Description*

Jillian SANTIAGO CRUZ, an alien, and native and citizen of Mexico, who had previously been removed from the United States on or about November 12, 2019, was found in the United States, having knowingly and unlawfully reentered the United States without first applying to the Attorney General or her successor, the Secretary for the Department of Homeland Security, for permission to reapply for admission, and without receiving in response the express consent to reapply for admission, in violation of 8 U.S.C. § 1326(a).

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

s/ Sean McLaughlin

*Complainant's signature*

Sean McLaughlin, Deportation Officer ICE

*Printed name and title*

Sworn to before me and signed in my presence.

Date: \_\_\_\_\_

City and state: Philadelphia, Pennsylvania

**José Raúl Arteaga** Digitally signed by  
 José Raúl Arteaga  
 Date: 2025.04.01  
 14:15:46 -04'00'

*Judge's signature*

JOSÉ RAÚL ARTEAGA, U.S. Magistrate Judge

*Printed name and title*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
v.	:	<b>MAGISTRATE No. 25-mj-675</b>
<b>JILLIAN SANTIAGO CRUZ</b>	:	
<b>a/k/a Julian SANTIAGO</b>	:	
<b>a/k/a Julian Santiago RODAS</b>	:	

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT**

1. I, Sean McLaughlin, am an Enforcement and Removal Officer for the United States Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”), assigned to the Philadelphia Field Office covering Montgomery County. I have been employed as an ICE Officer since 2007. As part of my duties, I conduct investigations related to violations of the Immigration and Nationality Act, including by foreign-born nationals who have been deported from the United States and subsequently re-entered the United States illegally.

2. I make this affidavit in support of a criminal complaint charging Jillian SANTIAGO CRUZ, a/k/a “Julian SANTIAGO,” a/k/a “Julian Santiago RODAS,” date of birth in May 1987 (herein after referred to as "SANTIAGO CRUZ"), with illegal re-entry after deportation, as investigation shows that SANTIAGO CRUZ, an alien, that is, a person not a citizen or national of the United States, re-entered the United States after deportation, in violation of Title 8, United States Code, Section 1326(a).

3. I have learned during my investigation of SANTIAGO CRUZ that, according to records maintained by DHS, SANTIAGO CRUZ is a native and citizen of Mexico who was formally removed from the United States to Mexico on or about November 12, 2019.

4. On March 27, 2025, SANTIAGO CRUZ was arrested by the Plymouth Township Police Department and charged in the Montgomery County Municipal Court with theft by unlawful taking of movable property in violation of 18 Pa. Cons. Stat. § 3921(A); receiving stolen property in violation of 18 Pa. Cons. Stat. § 3925(A); access device issued to another who did not authorize use, in violation of 18 Pa. Cons. Stat. § 4106 (A1II); and unauthorized use of a motor/other vehicle, in violation of 18 Pa. Cons. Stat. § 3928(A). Upon arrest, SANTIAGO CRUZ was assigned Pennsylvania State Identification Number PA58836524.

5. Also on or about March 27, 2025, the Plymouth Township Police Department processed SANTIAGO CRUZ's fingerprints. That processing showed that SANTIAGO CRUZ's fingerprints matched the fingerprints of an individual with FBI number 57097HD4 and the Fingerprint Identification Number ("FIN") 1100527919.

6. Following the arrest and fingerprinting of SANTIAGO CRUZ, ICE officials were notified electronically of SANTIAGO CRUZ's arrest via government databases. The notification showed that there were fingerprints on file in ICE's files, under the name Jillian SANTIAGO CRUZ, and connected to FBI number 57097HD4; Pennsylvania State Identification Number PA58836524; FIN number 1100527919; and Alien Registration Number A 087 677 209. These identifiers matched the identifiers of the SANTIAGO CRUZ who was arrested and fingerprinted by the Plymouth Township Police Department in connection with SANTIAGO CRUZ's arrest on or about March 27, 2025.

7. Your affiant reviewed DHS records related to SANTIAGO CRUZ's Alien File numbered 087 677 209, which is maintained by ICE.<sup>1</sup> The following representations are based on my review of DHS's electronic records and databases:

- a. SANTIAGO CRUZ is a citizen and national of Mexico.
- b. There is no evidence in these records that SANTIAGO CRUZ is a citizen or national of the United States.
- c. On February 19, 2010, SANTIAGO CRUZ was served with a Notice to Appear and placed into immigration proceedings.
- d. On March 29, 2011, SANTIAGO CRUZ was ordered removed in absentia by an Immigration Judge pursuant to Section 212(a)(6)(A)(i) of the Immigration and Nationality Act.
- e. On October 28, 2019, SANTIAGO CRUZ was taken into ICE custody after a conviction for driving under the influence of alcohol.
- f. On or about November 12, 2019, the United States immigration authorities, pursuant to Form I-205, a Warrant of Deportation/Removal, removed SANTIAGO CRUZ, via Brownsville-Matamoros, Texas, to Mexico. Contained on Form I-205 was the photograph, signature, and fingerprint belonging to SANTIAGO CRUZ and the signature of immigration officers who witnessed his deportation.

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<sup>1</sup> An Alien File, or "A-File," is a file maintained by ICE which contains documentation relating to the alien, including his/her photograph, warrants of deportation, fingerprints, documents reflecting criminal history, documents reflecting the country of citizenship, and other documents. Each alien is assigned a unique identification number, referred to as an "Alien Number."

g. Your affiant reviewed DHS records, including SANTIAGO CRUZ's Alien file, and found no evidence that SANTIAGO CRUZ applied for or was granted permission to re-enter the United States after his removal.

8. Wherefore, based upon all of these facts, your affiant avers that there is probable cause to believe that SANTIAGO CRUZ is an alien who was deported from the United States, and that he is currently in the United States without the express consent of the United States Attorney General or Secretary of the Department of Homeland Security. Your affiant respectfully requests that this Honorable Court issue a warrant ordering his arrest for such crime.

/s/ Sean McLaughlin  
Sean McLaughlin  
Deportation Officer  
Immigration and Customs Enforcement

SWORN TO AND SUBSCRIBED BEFORE ME BY TELEPHONE  
THIS 1st DAY OF April 2025:

**José Raúl  
Arteaga**

Digitally signed by José Raúl  
Arteaga  
Date: 2025.04.01 14:16:36  
-04'00'

JOSÉ RAÚL ARTEAGA  
United States Magistrate Judge